

ATTACHMENT 5

INSPECTIONS

5.A. INSPECTION PROCEDURES

- 5.A.I. The inspections outlined in this Attachment are the minimum required. All inspections required by this permit shall be documented on forms and maintained as part of the facility operating record. Copies of the inspection forms are found in Appendix A-ATTACHMENT 5.
- 5.A.II. The Branch Manager or designee (the inspector) shall be responsible for carrying out and documenting the facility inspections each business day. The inspector shall note any identified ruptures, spills, or repairs that are needed and note remedy actions. If the inspector cannot carry out the repairs, the inspector shall work with an engineering project manager at Safety-Kleen's corporate headquarters to complete the repairs. Completion of repairs shall be noted on the Facility inspection record.
- 5.A.III. Facility inspections shall include the following:
- 5.A.III.a. Tank inspections -- Tanks holding the clean solvent and the tank holding the spent solvent shall be inspected at least once each business day. The inspections shall include checks of the high level alarm and of the volume of solvent held in the tank. Sudden deviations in the solvent volumes shall be immediately investigated and the cause determined. If necessary, repairs shall be initiated immediately. Pick-ups of spent solvent shall be scheduled on a regular basis. The spent solvent quantity shall not exceed the permitted tank volume at any time. The tanks are equipped with high-level audiovisual alarms and manual shut-off valves.
- 5.A.III.b. The secondary containment for the tanks shall be inspected each business day for cracks or other deterioration. Any damage to the tanks (such as rust or loose fixtures) or the secondary containment shall be noted and repairs initiated.
- 5.A.III.c. Air emission inspections shall be conducted on the waste tank and ancillary equipment in accordance with Condition 5.B. of this attachment.
- 5.A.III.d. Air emission inspections shall be conducted on the containers and tank system in accordance with Condition 5.C. of this attachment.
- 5.A.III.e. Solvent dispensing equipment -- The solvent dispensing hose, connections and valves shall be inspected for damage (such as cracks or leaks) and proper functioning. Any solvent left in the hoses shall be drained after use. The pumps, pipes and fittings shall be checked for damage and proper functioning. Any damage to the solvent dispensing equipment shall be noted and repaired.

- 5.A.III.f. Container storage areas -- Container storage areas shall be inspected for the number and condition of the drums stored. The total volume of the materials held in the container storage areas shall not exceed 4,500 gallons for the warehouse container storage area and 3,300 gallons for the metal shelter container storage area. Any leaking or suspect drum shall be placed in a salvage drum of adequate integrity. Drums shall be inspected to determine if they are properly labeled and marked in accordance with U.S. DOT and R315 of the rules. The secondary containment system, condition of the pad and sumps shall be inspected for deterioration or failure. If cracks or leaks are detected, they shall be repaired immediately.
- 5.A.III.g. Route vehicles -- Each route vehicle shall be inspected to ensure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment shall be inspected to determine if: sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses are in the vehicle. Any missing equipment shall be replaced.
- 5.A.III.h. Dumpster/drum washer -- The dumpster/drum washer at the return and fill station shall be inspected for leaks and sediment build-up. Any leaks shall be noted and repaired immediately and excess sediment shall be removed from the dumpster.
- 5.A.III.i. Safety equipment -- The fire extinguishers shall be checked weekly to ensure that the units are charged and accessible, and shall be inspected annually. The fire suppression system shall be checked weekly to ensure that the unit is charged and shall be inspected annually. In addition, proper operation of the eyewash shall be confirmed and the first aid kit and sorbents shall be inspected for adequate content and accessibility. The identity and location of the emergency equipment required at the facility is included in ATTACHMENT 3, Preparedness and Prevention.
- 5.A.III.j. Security -- The operation of each gate and lock shall be inspected. In addition, the fence and danger signs shall be inspected for deterioration on a weekly basis.

5.B. SUBPART BB INSPECTION PROCEDURES FOR TANK/DRUM WASHER SYSTEM

- 5.B.I. These inspection procedures identify leaks from pumps, valves, flanges and other equipment associated with the return and fill station/drum washer and tank system and demonstrate compliance with the inspection requirements of R315-8-18.
- 5.B.II. Pumps/Valves/Flanges/Other Equipment
- 5.B.II.a. Each pump, valve, flange and other equipment as defined in R315-8-18 (specifically 40 CFR 264.1051) shall be marked with a unique ID as indicated on the Subpart BB Valve, Pump, and Flange Labeling Diagram in ATTACHMENT 7.

- 5.B.II.b. Each pump, valve, flange and other equipment in the regulated system shall be inspected each operational day for any evidence of potential leakage, which is indicated by any visual sign of liquids leaking/dripping from the equipment, dripping or hissing sound, or incidental solvent odor.
- 5.B.II.c. Evidence of potential leakage and means determined shall be noted on the inspection log. Within five days of noting a potential leak, the Permittee shall perform monitoring in accordance with 40 CFR 264.1063(b) and record the results. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
- 5.B.II.d. When a leak is detected, it shall be repaired as soon as practical, but not later than 15 calendar days after being detected, except as provided in 40 CFR 264.1059.
- 5.B.II.e. Should a leak be detected, a first attempt at repair (e.g., tightening the packing gland) shall be made no later than five calendar days after the leak is detected.
- 5.B.II.f. Equipment discovered to be leaking shall be identified with a weatherproof tag containing the following information:
- 5.B.II.f.i. Equipment I.D number; and
- 5.B.II.f.ii. Date leak found.
- 5.B.II.g. For pumps, a tag indicating a leak can be removed after effective repairs are made. For valves, this tag shall remain in place until two successive months of monitoring does not detect a leak.
- 5.B.III. Results of Subpart BB inspections shall be recorded in the facility operating record on the Inspection Log Sheet for daily inspection of Tank Equipment.
- 5.B.IV. All drum washer system detected leaks and the corrective action for each leak shall be recorded on the Leak Detection and Repair Record, which shall be kept as part of the facility operating record.

5.C. SUBPART CC INSPECTION PROCEDURES FOR CONTAINERS AND TANK SYSTEM

- 5.C.I. The Permittee shall inspect containers subject to Level 1 controls and their covers and closure devices as follows:
- 5.C.I.a. In the case when a hazardous waste is already in the container at the time the Permittee first accepts possession of the container at the facility and the container is not emptied within 24 hours after the container is accepted at the facility, the Permittee shall visually inspect the container and its cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position.

If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

- 5.C.I.b. In the case when a container used for managing hazardous waste remains at the facility for a period of 1 year or more, the Permittee shall visually inspect the container and its cover and closure devices initially and thereafter, at least every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.
- 5.C.II. The Permittee shall inspect containers subject to Level 2 controls and their covers and closure devices in accordance with R315-8-22 (specifically 40 CFR 264.1086(d)(4)).
- 5.C.III. The Permittee shall inspect the tank system air emission control equipment in accordance with the following requirements:
 - 5.C.III.a. The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.
 - 5.C.III.b. The Permittee shall perform an inspection of the fixed roof and its closure devices at least once every year except as allowed below:
 - 5.C.III.b.i. Following the initial inspection of the cover, subsequent inspection may be performed at intervals longer than one year under the following conditions:
 - 5.C.III.b.i(A). In the case when inspecting the cover would expose a worker to dangerous, hazardous, or other unsafe conditions then the Permittee may designate a cover as an “unsafe to inspect cover” and comply with the following requirements:
 - 5.C.III.b.i(A)1. Prepare a written explanation for the cover stating the reasons why the cover is unsafe to visually inspect, if required.

- 5.C.III.b.i(A)2. Develop and implement a written plan and schedule to inspect the cover as frequently as practicable during those times when a worker can safely access the cover.
- 5.C.III.c. In the event a defect in the fixed roof or its closure devices is detected, the Permittee shall repair the defect in accordance with the following schedule: The Permittee shall make first efforts at repair of the defect no later than five calendar days after detection, and the repair shall be completed as soon as possible but no later than 45 calendar days after detection unless the Permittee determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available at the site to accept the hazardous waste normally managed in the tank. In this case, the Permittee shall repair the defect at the earliest available time when transfer of waste to the tank could be suspended and the tank emptied or removed from service. Repair of the defect shall be completed before the transfer of waste to the tank resumes.

APPENDIX A – ATTACHMENT 5

INSPECTION FORMS

- Insert - Inspection Log Sheet for daily inspection of Storage Tank System (4 pages)
- Inspection Log Sheet for daily inspection of Container Storage Area (1 page)
 - Inspection Log Sheet for weekly inspection of Safety and Emergency Equipment, Security Devices and Miscellaneous Equipment (1 page)
 - Leak Detection and Repair Record (1 page)